

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

SEP 12 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville DIVISION

JULIA C. DUDLEY, CLERK
BY: [Signature]
DEPUTY CLERK

Shikyella Davis, Kaiden Morton,
Kennedy Davis

Plaintiff(s),

v.

City of Charlottesville Department
of Social Services, CASA

Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.

Please attach additional sheets if necessary).

Civil Action No.: 3:19CV00053

(To be assigned by Clerk of District Court)

COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number. Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name:

Shikyella S. Davis

Address:

405 Premier crl, Charlottesville VA 22901

Telephone Number:

(434) 825-9228

b. Plaintiff No. 2

Name:

Kennedy N. Davis + Kaiden J. Morton

Address:

405 Premier crl, Charlottesville, VA 22901

Telephone Number:

(434) 825-9228

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: Charlottesville Department of Social Services

Address: 120 7th St NE, Charlottesville, VA 22902

b. Defendant No. 2

Name: CASA

Address: 818 E High St, Charlottesville, VA 22902

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☐ Federal Question

☐ Diversity of Citizenship

☒ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

410 ; Anti Trust , 440 Civil Right , 360 other Personal Injury , 290 All other Real Property , 370 other Fraud.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: _____ State of Citizenship: _____

Plaintiff No. 2: _____ State of Citizenship: _____

Defendant No. 1: _____ State of Citizenship: _____

Defendant No. 2: _____ State of Citizenship: _____

Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached. ☐

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. In the events leading to my children being kidnapped by CDSS (Charlottesville department of social services) and myself facing anxiety attacks along with my children due to not being properly helped. My children were taken 3-3-2017. My case at hand is being from this date until the date where myself and my children felt we were safe to take this action (10-24-2018). Due to being threatened with possible adoption under false allegations of drug use. The claim was that I did heroin. Not one of my

Drug tests conducted by CDSS came back positive for heroin. I was forced to do a number of things in order to safely get my children out of the captives hands. My children were beat, mentally brainwashed, & sexually abused while in foster care. I brought these to their attention and they still did not listen. My children felt as if the only way to survive was to just keep quiet because no one listened to them^{nor I} when we made CDSS, casa workers, and lawyers (whom were inexperienced) aware. I passed all psychiatric, and psychological tests performed. The only conclusion I can come to is it was all for money for the gov't because I took every measure when I made the decision to create my children to ensure that they were well taken care of. Our trust was violated, our dignity was violated, and our rights as humans were completely violated. This has ~~cost~~ cost us valuable time and suffering things that money can't replace but that we want ~~to~~ in order to regain what they thought they took and that's Justice.

Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached. ☐

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I would like the court to look more into details on such cases and interrogate more federal officials within the local govts because there is definitely fraud associated with the "kidnapping" of children in this city and not telling which others. Also UnSlander OUR names in the name of Justice W

We would like money compensation to come directly to us (Shikylla, Kennedy, + Kristen).

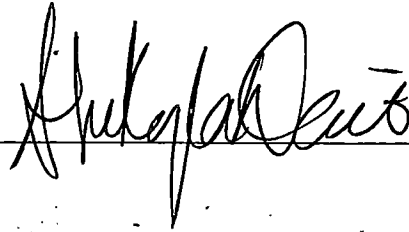
DEMAND FOR JURY TRIAL:

☒ YES

☐ NO

Signed this 12 day of Sept, 19.

Signature of Plaintiff No. 1



Signature of Plaintiff No. 2

NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.